REMARKS

Claims 1-16 were pending.

In the Office Action, claims 1, 2, 4, 5, 12 and 13 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,646,857 to Anderson et al ("Anderson"). Claims 3 and 14-16 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of JP 05-129421 to Matsunaga Daisuke. Claims 6-11 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. Patent No. 6,572,708 to Gujer et al.

Applicants have amended the specification and claims 1, 4-7, and 9-11 to more properly describe receptacle 6 of Figures 3-8 as a "support member." No new matter has been added. Claim 17 is new.

Applicants respectfully traverse the rejections of record.

I. Independent Claim 1

Independent claim 1 has been rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Anderson.

Claim 1 is directed to Applicants' inventive wafer lifting device which includes a separate pin guide provided for each pin, in which the pin is guided by the pin guide and held for longitudinal movement. Claim 1 further requires that the separate pin guides be fixedly connected to a wafer support member.

In contrast, Anderson is directed to a prior art wafer lifting device (such as described in the Applicants' specification). (See specification, paragraphs 0001, 0005, and 0009). Anderson's device includes a pin lifter yoke with a set of pins connected to it, where the set of pins is configured to move through an electrostatic chuck and contact the

NY02:535468.2 12

bottom surface of the wafer. (See Anderson, Abstract). Anderson's device has the disadvantage that the pins may rub the through holes which leads to the undesirable generation of particles and a scratching of the wafers on the underside. In Anderson's device, the pins move through the electrostatic chuck through a number of penetrations 226 or holes in the chuck. (See Anderson, col. 4 line 64 - col. 5 line 1). However, Anderson fails to disclose separate pin guides that guide each pin and that the pin guides are fixedly connected to the wafer support member as is required by Applicants' claim 1. Thus, Anderson does not anticipate claim 1. Applicants respectfully assert that claim 1 is patentable over Anderson.

II. Dependent Claims 2-16

Claims 2-16 are dependent upon claim 1 and are patentable over the cited art for at least the same reasons as independent claim 1 described above.

III. New Claim 17

Applicants' lifting device according to Claim 17 includes the elements of claim 1, but additionally includes the element of claim 2 and a further limitation that the lifting platform is "in direct engagement to the pins." Claim 17 includes all the elements of independent claim 1 and is patentable over the cited art for at least the same reasons as independent claim 1 described above.

NY02:535468.2 13

IV. CONCLUSION

In light of the foregoing, Applicants respectfully submit that pending claims 1-17 are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited. In the event that the application is not deemed in condition for allowance, the Examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,

Gary M. Butter

Patent Office Reg. No. 33,841

Manu J. Tejwani

Patent Office Reg. No. 37,952

BAKER BOTTS L.L.P.

30 Rockefeller Plaza

New York, New York 10112-0228

Attorney for Applicants

(212) 408-2500